

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Esther Salas
	:	
v.	:	Crim. No. 22-141
	:	
DA YING SZE, a/k/a "David"	:	18 U.S.C. § 1956(h)
	:	18 U.S.C. §§ 1960(a), (b)(1)(A),
	:	(b)(1)(B), and (b)(1)(C)
	:	18 U.S.C. § 215(a)(1)
	:	18 U.S.C. § 2

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE

(Conspiracy to Engage in Monetary Transactions in Property Derived from Specified Unlawful Activity)

From in or around January 2016 through in or around May 2021, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

DA YING SZE,
a/k/a "David,"

did knowingly and intentionally conspire and agree with others to knowingly engage and attempt to engage in monetary transactions by, through, and to a financial institution, in and affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, derived from a specified unlawful activity—that is, distribution and possession with intent to distribute a controlled substance and conspiracy to do so, contrary to Title 18, United States Code, Section 1957(a).

In violation of Title 18, United States Code, Section 1956(h) and Section 2.

COUNT TWO

(Operation and Aiding and Abetting the Operation of an Unlicensed Money Transmitting Business)

From in or around January 2016 through in or around May 2021, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

DA YING SZE,
a/k/a "David,"

knowingly conducted, controlled, managed, supervised, directed, and owned all or part of an unlicensed money transmitting business, and aided and abetted the conduct, control, management, supervision, direction, and ownership of such a money transmitting business, which business affected interstate and foreign commerce, and: was a business operated without an appropriate money transmitting license in a state where such operation is punishable as a misdemeanor or a felony under state law, that is, the State of New Jersey, State of New York, and State of Pennsylvania; was a business required to register with the Financial Crimes Enforcement Network ("FinCEN"), an agency of the United States government, pursuant to Section 5330 of Title 31, United States Code; and otherwise involved the transportation or transmission of funds that were known to the defendant to have been derived from a criminal offense and were intended to be used to promote or support unlawful activity.

In violation of Title 18, United State Code, Sections 1960(a), (b)(1)(A), (b)(1)(B), (b)(1)(C), and Section 2.

COUNT THREE
(Bribery of Bank Employees)

From in or around January 2020 through in or around May 2021, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

DA YING SZE,
a/k/a "David,"

corruptly gave, offered, and promised things of value, including gift cards, to employees of at least one financial institution, as defined in Title 18, United States Code, Section 20, with the intent to influence and reward such employees in connection with financial transactions and the business of such financial institution.

In violation of Title 18, United States Code, Section 215(a)(1).

FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO

As a result of committing the offenses charged in Counts One and Two of this Information, the defendant,

DA YING SZE,
a/k/a "David,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in such offenses, and all property traceable to such property, including, but not limited to all right, title, and interest of the defendant in the properties listed in Schedule A to this Information.

FORFEITURE ALLEGATION AS TO COUNT THREE

As a result of committing the offense charged in Count Three of this Information, the defendant,

DA YING SZE,
a/k/a "David,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), all property, real and personal, involved in such offense, and all property traceable to such property.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Provisions)

If any of the property described above, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;

- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 982(b), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.



PHILIP R. SELLINGER
United States Attorney

SCHEDULE A

- I. \$3,622,313.53 in cash, seized from the defendant DA YING SZE, a/k/a “David,” and co-conspirators on or about May 7, 2021 in or around Queens, New York;
- II. \$245,000 in official checks, which were seized from the defendant DA YING SZE, a/k/a “David,” on or about May 7, 2021 in or around Queens, New York;
- III. \$24,854.87 in money orders, which were seized from the defendant DA YING SZE, a/k/a “David,” on or about May 7, 2021 in or around Queens, New York;
- IV. One white 2015 Lexus LX 570, which was seized from the defendant DA YING SZE, a/k/a “David,” on or about May 7, 2021 in or around Queens, New York; and
- V. The contents of the following bank accounts:
 1. Bank of America account number *****2798;
 2. Royal Business Bank account number ****2321;
 3. Royal Business Bank account number *****7326;
 4. Amerasia Bank account number ****0782;
 5. Amerasia Bank account number ****5384;
 6. Amerasia Bank account number ****2253;
 7. Citibank account number *****8007;
 8. Citibank account number *****3816;
 9. Citibank account number *****3824;
 10. Citibank account number *****8424;
 11. Citibank account number *****8432;
 12. JP Morgan Chase account number *****0106;

13. Capital One Bank account number *****3333; and
14. Capital One Bank account number *****5528.

CASE NUMBER: _____

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District of New Jersey**

UNITED STATES OF AMERICA

v.

**DA YING SZE,
a/k/a "David"**

INFORMATION FOR

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18 U.S.C. §§ 1960(a), (b)(1)(A), (b)(1)(B), (b)(1)(C)
18 U.S.C. § 215(a)(1)
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